

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

DAWN GUARINO GEDEON,)	CASE NO.: 4:22-CV-00441-BYP
)	
Plaintiff,)	JUDGE: BENITA PEARSON
)	
vs.)	<u>DEFENDANTS' NOTICE OF</u>
)	<u>DISCOVERY DISPUTE</u>
MICHELLE NICOLE FRENCHKO, et al.,)	
)	
Defendants.)	
)	

Now come Defendants Michelle Nicole Frenchko and Board of Trumbull County Commissioners, by and through counsel, and hereby gives notice of a “discovery dispute” with Plaintiff Dawn Gedeon.¹

Defendants hired an ESI vendor to drive from Columbus this morning to image the **county-owned work cell phone** used by Plaintiff Dawn Gedeon. Plaintiff was notified by a commissioner a couple days ago that this was being scheduled, though the exact date was not provided to her. The vendor arrived around 9 am and Plaintiff, on the advice of counsel, has refused to produce the work phone to the vendor.

Plaintiff’s counsel emailed Defendant’s counsel this morning and said that he instructed his client not to produce the phone. Plaintiff’s counsel is in a mediation today and has so far refused to provide a phone number at which he can be reached, though he has sent several emails to the undersigned.

¹ Defendants do not consider this a “discovery” dispute, but rather that Plaintiff is wrongfully withholding county-owned property from the county.

Respectfully submitted,

MAZANEC, RASKIN & RYDER CO., L.P.A.

s/Kathleen M. Minahan

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Counsel for Defendants Michelle Nicole Frenchko
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CERTIFICATE OF SERVICE

I hereby certify that on February 1, 2023, a copy of the foregoing Defendants' Notice of Discovery Dispute was filed electronically. Notice of this filing will be sent to all registered parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/Kathleen M. Minahan

KATHLEEN M. MINAHAN (0064989)

Counsel for Defendants Michelle Nicole Frenchko
and Trumbull County Commissioners

CORSA-210182/Ds Ntc of Discovery Dispute